

Avram E. Frisch, Esq. (AF-0187)
The Law Office of Avram E. Frisch LLC
1 University Plaza, Suite 119
Hackensack, NJ 07601
(201) 289-5352
frischa@avifrischlaw.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

----- x

Devi Rajshri Sethumadhava Menon
Plaintiff

Civil Action No. 2:21-cv-08384-KM-
JBC

V.

Ward Corbett and Catalyst Partners Management
LLC

**MOTION FOR DEFAULT
JUDGMENT**

Defendants

----- x

Plaintiff Devi Rajshri Sethumadhava Menon moves the Honorable Esther Salas, U.S.D.J.

on April 7, 2025 pursuant to Rule 55(b) Federal Rules of Civil Procedure to enter

Default Judgment in her favor and against Defendants Ward Corbett and Catalyst

Partners Management LLC in the amount of \$100,000 in actual damages, and punitive

damages of \$200,000 for a total judgment of \$300,000 plus interest and costs on the

ground that Default has been entered against the Defendants by the Clerk for failure to

answer or otherwise defend.

Respectfully submitted,

THE LAW OFFICE OF AVRAM E. FRISCH LLC
Attorney for plaintiff

By: Avram E. Frisch

Dated: March 5, 2025

Avram E. Frisch, Esq.